

ATTACHMENT B-1

To
D. A. Davis

Date
June 16, 1983



From
Carl R. Piercy *Carl*
Extension
Location
H.O. Chemical Operations

Copies to
C. A. Thompson
A. M. McMahon
M. Tuxson - WR
J. Hill - S.F. Dist.
D. L. Eisner
W. B. Westrope - WR
D. Krome - S.F. Branch

Subject
RWQB MEETING NOTES
GROUNDWATER CONTAMINATION
SAN FRANCISCO BAY

The meeting of June 15, 1983 requested by the Regional Water Quality Board was chaired by Dave Krome, and included Piercy, Sands and Martin from our side, and reps from Alameda Co. Water and the State Dept. of Health. A roster copy is attached.

Dave expertly expounded our position of not being convinced that we were responsible for the constituents found in the one test well, citing soil analyses of last year and the potential sources of neighboring operations, and constituents found that were known to have never been handled at this location.

Eisenberg, the obvious leader for RWQB, admitted that buried tank leakage was obviously not involved, but that there was groundwater contamination in the eyes of the Board and that the source had to be defined and cleanup operations initiated. He stated that the Board had the legal authority to require these actions. (See partial copy of Calif. Water Act, attached).

Eisenberg admitted that the "foreign" contaminants found could indicate that there might be an up-gradient source (Magnaflux), but that neighboring operations had not been requested to sink test wells, hence additional data possibly helpful to us is not now available. (Eisenberg advised they would be doing some snooping right after the meeting which would probably lead to test wells being requested on others' property).

The contaminant-free soil samples of last year were put down as not applicable since their experience had shown little correlation between soil and groundwater analyses. In addition, a dike water analysis of Feb. 15, 1983, showing before and after carbon filtration (attached) showed some of the same constituents as in the well analyses.

McKESSON v. CNA
NO. 071-009
Eisner 6-7-84
NAME EXHIBIT # DATE

D. A. Davis
June 16, 1983
Page 2

Eisenberg spoke of the need to define the hydraulic gradient (this requires a minimum of three well bores) and determination of contamination in groundwaters coming onto and leaving our property. RWQB will immediately write Dave, requesting our proposal for Phase II actions in dealing with this situation, implying that they will expect two additional wells to be drilled and sampled as a start.

Regarding the situation of Magnaflux being a potential source, it was stated that RWQB's position is that all parties must share in the cost of cleanup. Methods of cleanup and their related costs were not discussed, but Eisenberg very definitely indicated that help from their staff was not only available, but advisable so as to limit cleanup costs.

When questioned as to what level of concentration constituted contamination, Eisenberg would not be pinned down. He cited one case where, because of soil conditions, 0.015 ppm was deemed to be a "contaminant". Sands later indicated his opinion that the Board probably works around a figure of 1 ppm as a base number.

It came out from Alameda Co. Water that they have one deep well (500-600 ft.) within one-quarter mile of our property, and this has been tested with negative results. The closest private shallow wells are 1-1½ miles distant, and there are no plans to test these.

It was determined after the meeting in our group that resampling of our well had not been done, and that subsequent testing would only involve the four or five constituents previously found, thus reducing the cost to the range of \$300. Dave agreed to order resampling for simple corroboration of the first results.

CRP/s

Attachments

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1111 JACKSON STREET, ROOM 6040

OAKLAND 94607

Phone: Area Code 415
464-1255

June 9, 1983

File No. 1220.03(MRK)tmb

McKesson Chemical Company
33950 7th Street
Union City, CA 94587

Attn: David A. Krome

Dear Mr. Krome:

The Regional Board staff has reviewed your report on the preliminary subsurface investigation done on your facility. We believe that the levels of contamination measured in the soil and ground water justify further investigation. It is now necessary for you to determine the source of contamination, the lateral and vertical extent of contamination, what actions may be necessary to preclude further migration and to identify what appropriate clean-up strategies may need to be implemented.

Mr. Martin Kurtovich has been assigned as the Regional Board staff person for your site. Mr. Kurtovich will be contacting you shortly to set up a meeting to discuss the next phase of the investigation.

We appreciate your assistance in this matter. If you have any immediate questions, please contact Don Eisenberg at (415) 464-0379.

Sincerely,

HAROLD J. SINGER
Toxics Division Chief

Tell to:

Prove its not

McK00476

McKesson Chemical

6/15/83

Name
Organization

Organization
Name

CARL R. PIERCY

PAUL G. MARSHALL

Dale Sands

Dave Krome

Chuck Henberg

Hugh Poustinchi

Martin Kartovich

Don Eisenberg unrec

Engineering Director, MCK, S.F.

McKesson Environmental Services, Dub.

McKesson Environmental Services

McKesson Chemical, Union City,

Calif. Dept. of Health Services

ACWD, Fremont 297-1970

CRWQCB

"

copy of
letter
at 10/1/83
to Dave

McK00477

2-15-83

		Concentration in mg/l (ppm)		
		Dike Water 04566	Filtered 04567	2nd filtering 04585
Methylene Chloride *		0.41	0.012	0.015 ?
1,1-Dichloroethylene *		0.27		
1,1,1-Trichloroethane		4.6	0.14	0.02
Tetrachloroethylene		690		
Toluene		1002		
Propanol/Acetone				
Propanol/Acetone *		< 1 ppm		
TOC		120	51	52
* -	Compound NOT ON LIST OF Compounds Mon			

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1111 JACKSON STREET, ROOM 6040
OAKLAND 94607Phone: Area Code 415
464-1255

October 23, 1981

File No. 2223.09 (JDL)aj

OCT 29 1981

McKesson Chemical Co.
33950 7th Street
Union City, CA 94587

Attention: David A. Krome, Branch Manager

Dear Mr. Krome:

The following criteria are hereby transmitted for the discharge of stormwater from your Union City facility:

	<u>Discharge Limits</u>	<u>TOC Equivalent</u>
pH	6.5-8.5	
perchloroethylene	5.2 ppm	~1 ppm
cyclohexanone	1 ppm	~1 ppm
chloroform	28.9 ppm	3 ppm
chlorobenzene	10 ppm	6.7 ppm
xylene	10 ppm	~10 ppm
toluene	17 ppm	~17 ppm
1,1,1-trichloroethane	18 ppm	3.3 ppm
styrene monomer	25 ppm	~25 ppm
triethanolamine	26 ppm	~13 ppm

BETWEEN
3-59 PP
MOST TEST
TOC

In light of the steps McKesson has taken to eliminate accidental discharges we do not expect to find these constituents in the stormwater very often and have therefore set these limitations based upon acute toxicity to freshwater fish rather than the more restrictive chronic toxicity levels.

McKesson has constructed valved gates on it's storm drain inlets and can now hold and sample runoff from drum storage and tanker loading areas before discharge. In the interest of reducing monitoring costs, reference is made to the use of a TOC or Total Organic Carbon test which could be used to measure the total concentration of solvents in the collected stormwater.

McKesson has the opportunity of using the TOC test to screen stormwater samples, rather than initially testing for each solvent of concern. Those samples whose TOC concentration is below the discharge criteria (TOC equivalent) for any of the above chemicals, need not then be tested for those specific solvents. Stormwater solvent analyses will be required for those solvents whose TOC equivalent criteria is less than the sample TOC concentration.

McK00479

October 23, 1981

We are presently uncertain of the amount of naturally-occurring background TOC which may be present in runoff from your facility (from precipitation, asphalt bleeding, etc.). This background may interfere with the screening procedure for those solvents with the highest fish toxicity and the corresponding lowest discharge criteria. Since those solvents are fairly volatile, using a "purge and trap" extraction and analyzing this captured distillate for TOC may eliminate possible interferences from non-volatile road oils and other compounds. We encourage McKesson to investigate this and any other possible screening procedures. Analyses for each solvent will be required when screening is unsuccessful. This office will aid you in the evaluation of screening procedures, as you propose them.

As far as a general TOC requirement is concerned, we will allow stormwater discharges with a TOC of <3 ppm with no further testing requirement. For stormwater samples with a TOC exceeding 60 ppm we will require a chemical identification of its organic components to 1 ppm. These results will then be evaluated by this office prior to discharge authorization.

All test results should be transmitted to this office monthly, in writing, if discharge criteria has been met. If test results exceed the assigned criteria, stormwater should not be released and this office should be notified by telephone to discuss disposal alternatives. McKesson should investigate these alternatives prior to this occurrence including Union Sanitary District disposal, carbon filtration, aeration, etc.

Please feel free to contact Mr. James Levine at (415) 464-4346 to discuss any questions you may have concerning this program. Your continued cooperation is appreciated.

Sincerely,


DR. TENG-CHUNG WU
South Bay Division Chief

~~3-59 P1~~
TEST MAE
ON ALL
CHEMICALS
ON P9.
60 L
TEST +
IDENTIFY
ALL ORGANIC
CONSTITUENTS
SEND TEST
RESULTS TO
JAMES LEVINE
CALL HIM
FIRST.

Foremost-McKesson
Chemical Group
McKesson Chemical Company
33950 7th Street
Union City, CA 94587
415 489 1400

February 22, 1983



Mr. Bruce Wolfe
Water Quality Control Board
San Francisco Bay Region
1111 Jackson St., Room 6040
Oakland, CA 94607

Dear Mr. Wolfe:

The attached is an itemized listing of our present dike water prior to and after filtering. As per our telephone conversation of today, February 22, 1983, we will begin filtering for release of the present retained water.

Again, thank you for your help and support in dealing with what in the past has been a major concern for McKesson and myself.

Sincerely,

MCKESSON CHEMICAL COMPANY

Bob Balentine
Operations Manager

It

CC: Dave Krome
Ken Wicks



McK00481

take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the provisions of Section 13241.

(b) A regional board, in prescribing requirements, need not authorize the utilization of the full waste assimilation capacities of the receiving waters.

(c) The requirements may contain a time schedule, subject to revision in the discretion of the board.

(d) The board may prescribe requirements although no discharge report has been filed.

(e) Upon application by any affected person or on its own motion, the regional board may review and revise requirements. All requirements shall be reviewed periodically.

(f) The regional board shall notify in writing the person making or proposing the discharge or the change therein of the discharge requirements to be met. After receipt of such notice, the person so notified shall provide adequate means to meet such requirements.

(g) No discharge into the waters of the state, whether or not such discharge is made pursuant to waste discharge requirements, shall create a vested right to continue such discharge. All discharges of waste into waters of the state are privileges, not rights.

13264. (a) No person shall initiate any new discharge of waste or make any material change in any discharge prior to the filing of the report required by Section 13260 nor shall any such person do so thereafter and prior to: (1) the issuance of waste discharge requirements pursuant to Section 13263, (2) the expiration of 120 days after his compliance with Section 13260, or (3) the regional board's waiver pursuant to Section 13269, whichever of (1), (2), or (3) occurs first.

(b) The Attorney General, at the request of a regional board, shall petition the superior court for the issuance of a temporary restraining order, preliminary injunction, or permanent injunction, or combination thereof, as may be appropriate, prohibiting forthwith any person who is violating or threatening to violate this section from: (1) discharging the waste in question or (2) making any material change therein, whichever of (1) or (2) is applicable.

13265. (a) Any person discharging waste in violation of Section 13264, after such violation has been called to his attention in writing by the regional board, is guilty of a misdemeanor. Each day of such discharge shall constitute a separate offense.

(b) Any person discharging hazardous waste, as defined in Section 25117 of the Health and Safety Code, in violation of

Section 13264 is guilty of a misdemeanor and may be liable civilly in a sum of not to exceed twenty-five thousand dollars (\$25,000) for each day in which such violation occurs. Such sum shall be assessed and recovered pursuant to subdivision (b) of Section 13350, provided that such liability shall not be imposed if the discharger is not negligent and immediately files a report of the discharge with the board, or if the regional board determines that the violation of Section 13264 was insubstantial.

This subdivision shall not be applicable to any waste discharge which is subject to Chapter 5.5 (commencing with Section 13370).

13266. Pursuant to such regulations, as the regional board may prescribe, each city, county, or city and county shall notify the regional board of the filing of a tentative subdivision map, or of any application for a building permit which may involve the discharge of waste, other than discharges into a community sewer system and discharges from dwellings involving five-family units or less.

13267. (a) A regional board, in establishing or reviewing any water quality control plan or waste discharge requirements, or in connection with any action relating thereto or authorized by this division, may investigate the quality of any waters of the state within its region.

(b) In such an investigation, the regional board may require that any person discharging or proposing to discharge waste within its region or any citizen or domiciliary, or political agency or entity of this state discharging or proposing to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, such technical or monitoring program reports as the board may specify; provided that the burden, including costs, of such reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained therefrom.

When requested by the person furnishing a report, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public but shall be made available to governmental agencies for use in making studies; provided, however, that such portions of a report shall be available for use by the state or any state agency in judicial review or enforcement proceedings involving the person furnishing the report.

(c) In such an investigation, the regional board may inspect the facilities of any such person to ascertain whether the purposes of this division are being met and waste discharge requirements are being complied with. Such inspection shall be made with the consent of the owner or possessor of such facilities or, if such consent is refused,

with a warrant duly issued pursuant to the procedure set forth in Title 13 (commencing with Section 1822.50) of Part 3 of Code of Civil Procedure; provided, however, that in the event of an emergency affecting the public health or safety such inspection may be made with consent or the issuance of a warrant.

13268. (a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or falsifying any information provided therein, is guilty of a misdemeanor.

(b) Any person discharging hazardous waste, as defined in Section 25117 of the Health and Safety Code, knowingly failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or knowingly falsifying any information provided therein, is guilty of a misdemeanor and may be civilly liable in a sum not to exceed five thousand dollars (\$5,000) for each day the reports are not furnished or are falsified. Such sum shall be assessed and recovered pursuant to subdivision (b) of Section 13350.

This subdivision shall not be applicable to any waste discharge which is subject to Chapter 5.5 (commencing with Section 13370).

13269. The provisions of subdivisions (a) and (b) of Section 13260, subdivision (a) of Section 13261, or subdivision (a) of Section 13264 may be waived by a regional board as to a specific discharge or a specific type or discharge where such waiver is not against the public interest. Such waiver shall be conditional and may be terminated at any time by the board.

13270. Where a public agency as defined in subdivision (b) of Section 13400 leases land for waste disposal purposes to any other public agency, including the State of California, or to any public utility regulated by the Public Utilities Commission, the provisions of Sections 13260, 13263, 13264 shall not require the lessor public agency to file any waste discharge report for the subject waste disposal, and the regional board and the state board shall not prescribe waste discharge requirements for the lessor public agency as to such land provided that the lease from the lessor public agency shall not contain restrictions which would unreasonably limit the ability of the lessee to comply with waste discharge requirements appurtenant to the leased property.

13271. (a) Except as provided by subdivision (b), any person who, without regard to intent or negligence, causes or permits any hazardous substance to be discharged in or on any waters of the state, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the state, shall, as soon as (1)

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 90-057
NPDES NO. CA0029700

WASTE DISCHARGE REQUIREMENTS FOR:

MCKESSON CORPORATION, UNION CITY
ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board), finds that:

1. McKesson Corporation, (hereinafter called the discharger), by application (dated November 17, 1989, and by addendum dated February 22, 1990) has applied for issuance of waste discharge requirements and a permit to discharge waste under the National Pollutant Discharge Elimination System (NPDES).
2. The discharger operated a chemical packaging and distribution facility at 33950 Seventh Street, in Union City, Alameda County from 1971 until 1986. The facility handled and repackaged inorganic and organic chemicals, including caustics, chlorine, and organic solvents. Chemicals were stored in both aboveground tanks and underground tanks at various times during the operation of the facility. Chemicals were detected in the soil and groundwater beneath the facility in the early 1980's. Chemical compounds which were used, stored, and/or found in the groundwater include: trichloroethene (TCE), tetrachloroethene (PCE), 1,1,1-trichloroethane (1,1,1-TCA), and 1,1-dichloroethene (1,1 DCE), dibromochloromethane, trichlorofluoromethane, 1,1,2-trichloro 1,2,2-trifluoroethane (Freon 113), 1,2-dichloroethane, 1,1-dichloroethane, chloroform, trans-1,2-dichloroethene, trans-/cis-1,2-dichloroethene, 1,1,2,2-tetrachloroethane, methylene chloride, bromoform, carbon tetrachloride, bromodichloromethane, 1,2-dichlorobenzene, 1,1,2-trichloroethane, toluene, xylenes, methyl ethyl ketone, acetone, isopropyl alcohol, and gasoline and diesel. However, the chemicals in the groundwater at the highest concentrations and which are the most widespread are TCE, PCE, 1,1,1-TCA, and 1,1-DCE. The chemicals found in the groundwater are believed to be the result of poor housekeeping practices.
3. The discharger has been investigating the nature and extent of soil and groundwater pollutants. Since 1986, the investigation and remedial activities have been governed by Site Cleanup Order (SCO) No. 86-3 (adopted February

19,1986), and its successor SCO No. 88-104 (adopted June 15, 1988). The investigations to date have revealed that some of the onsite pollutants have migrated offsite.

4. The discharger seeks to minimize the further migration of pollutants in the affected groundwater by installing a groundwater extraction and treatment system. This system will consist of 24 extraction wells with subsequent treatment of the extracted groundwater by granular activated carbon adsorption and air stripping (Remedial Investigation and Feasibility Study, July 14, 1989 by Harding Lawson Associates). Average flows discharged from the groundwater extraction system are expected to be 95 gallon per minute (gpm). The planned discharge of this treated groundwater is to the storm drain near 7th Street which is tributary to the Alameda County Flood Control District Channel, Alameda Creek, and South San Francisco Bay. The planned discharge point is upgradient of the Alameda County Water District's groundwater recharge facilities for domestic water supply.
5. Concentration of dissolved metals in the groundwater have not been studied extensively. McKesson believes that metals in the groundwater did not originate from their facility. McKesson also believes that the concentration of dissolved metals may represent background levels. In samples analyzed so far zinc and nickel were found at levels above Basin Plan shallow zone discharge limits. McKesson believes that only during a large precipitation event will the discharge reach the San Francisco Bay. However, if the discharge did reach the San Francisco Bay the concentrations would be greatly diluted. McKesson has agreed to study background dissolved metal concentrations, as well as dissolved metal concentrations in the treatment system influent, effluent, and in the receiving waters.
6. The discharger has considered the feasibility of reclamation, reuse or discharge to a publicly owned treatment works, as specified in Board Resolution No. 88-160.

The discharger has identified and contacted twelve potential users for the treated groundwater. To date only one potential user (Glad-A-Way Gardens) has shown as interest in using the treated groundwater. Glad-A-Way Gardens grows gladiolus on property adjacent to the site. Although Glad-A-Way Gardens may be able to use some of the treated groundwater, they may not be able to use all of the treated groundwater all of the time. McKesson is willing to working with Glad-A-Way Gardens to implement this use for the treated groundwater. Use of reclaimed water shall be in compliance with all local permit requirements including that of the Alameda County Water District.

The discharger has contacted the Union Sanitary District (USD) for possible discharge of the treated groundwater to the sanitary sewer. By letter dated January 29, 1990 the USD refused to accept the treated groundwater as the sewer mains at this location are at full capacity.

6. The Regional Board adopted a revised Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) on December 17, 1986. The Basin Plan contains water quality objectives for Alameda Creek and South San Francisco Bay and contains discharge prohibitions applicable to shallow water discharges in these areas.
7. The existing and potential beneficial uses Alameda Creek and South San Francisco Bay include:
 - a) Contact and non-contact water recreation
 - b) Wildlife habitat
 - c) Preservation of rare and endangered species
 - d) Estuarine habitat
 - e) Fish spawning and migration
 - f) Industrial service supply
 - g) Shellfish harvesting
 - h) Navigation
 - i) Ocean commercial and sport fishing
 - j) Groundwater recharge
- 8) The existing and potential beneficial uses of the groundwater in the area include:
 - a) Municipal and domestic supply
 - b) Industrial process supply
 - c) Industrial service supply
 - d) Agricultural supply
- 9) Effluent limitations of this Order (as shown in section A below) are based on the Clean Water Act, the Basin Plan, State and U.S. Environmental Protection Agency (EPA) plans and policies, best available treatment economically available (BATEA), and best engineering judgement. EPA Region IX draft guidance "NPDES Permit Limitations for Guidance Document" was also considered in the determination of effluent limits.
10. The Basin Plan prohibits discharge of wastewater which has "particular characteristics of concern to beneficial uses" a) "at any point in San Francisco Bay south of the Dumbarton Bridge" and (b) "at any point where the wastewater does not receive a minimum initial dilution of at least 10:1 or into any non-tidal

water, dead-end slough, similar confined water, or any immediate tributary thereof."

11. The Basin Plan allows for exceptions to the prohibitions referred to in Finding 10 above when it can be demonstrated that a net environmental benefit can be derived as a result of the discharge.
12. Exceptions to the prohibitions referred to in Finding 10 are warranted because the discharge is an integral part of a program to cleanup contaminated ground water and thereby produce an environmental benefit, and because receiving water concentrations are expected to be below levels that would effect beneficial uses. Should studies indicate chronic effects, not currently anticipated, the Board will review the requirements of this Order based upon section B.1.e.
13. The Basin Plan prohibits discharge of "all conservative toxic and deleterious substances, above those levels which can be achieved by a program acceptable to the Board, to waters of the Basin". The discharger's ground water extraction and treatment system and associated operation, maintenance, and monitoring plan constitutes an acceptable control program for minimizing the discharge of toxicants to waters of the State.
14. The issuance of waste discharge requirements for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.
15. The Board has notified the discharger and interested agencies and persons of its intent to issue waste discharge requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.
16. The Board, in a public meeting on May 16, 1990, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the discharger, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following:

A. DISCHARGE PROHIBITIONS

1. Neither the treatment nor the discharge of pollutants shall create a pollution, contamination, or nuisance as defined by Section 13050 of the California Water Code.
2. The discharge shall be limited to treated groundwater and added chemicals which do not adversely affect the environment and comply with requirements of this Order.
3. Bypass of untreated or partially treated groundwater at/to the discharge point is prohibited.
4. The maximum monthly average flow shall not exceed 160,000 gallon per day (gpd). If additional units, similar to the original treatment units, are provided then additional flow may be permitted in proportion to the capacity of the additional units to a maximum of 288,000 gpd. Before discharge of this additional flow commences, written approval must be obtained from the Boards Executive Officer.

B. EFFLUENT LIMITATIONS

1. The effluent at the point(s) of discharge to (surface waters) shall not contain constituents in excess of the following:

TABLE 1

Constituent	Instantaneous Maximum Limit * (µg/l)
<u>VOC's</u>	
Trichloroethene	0.5
Tetrachloroethene	0.5
1,1,1-Trichloroethane	0.5
1,1-Dichloroethene	0.5
Dibromochloromethane	0.6
Trichlorofluoromethane	0.5
1,1,2-Trichloro 1,2,2-Trifluoroethane	0.6
1,2-Dichloroethane	0.5

1,1-Dichloroethane	0.5
Chloroform	0.5
Trans-1,2-Dichloroethene	0.5
Trans-/Cis-1,2-Dichloroethene	0.5
1,1,2,2-Tetrachloroethane	0.5
Methylene Chloride	2.0
Bromoform	0.7
Carbon Tetrachloride	0.6
Bromodichloromethane	0.7
1,2-Dichlorobenzene	4.0
1,1,2-Trichloroethane	0.6
 Benzene	 0.5
Ethylbenzene	0.5
Toluene	0.5
Xylenes	0.5
 Total VOCs (sum of all EPA 601 & 602 Compounds)	 50.0

OTHER COMPOUNDS

Methyl Ethyl Ketone	20.0
Acetone	20.0
Isopropyl Alcohol	30.0

TPH

Total petroleum hydrocarbons as gasoline and diesel	50.0
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* These Effluent Limitations are based on detection limits (for reporting) for EPA Test Methods 601/602 as provided by the discharger's laboratory, which is certified by the California Department of Health Services.

- The pH of the discharge shall not exceed 8.5 nor be less than 6.5.
- TOXICITY: The survival of rainbow trout in 96-hour bioassays of the effluent as discharged shall be a median of 90% survival and a 90 percentile value of not less than 70% survival.

B. RECEIVING WATER LIMITATIONS

1. The discharge of wastes shall not cause the following conditions to exist in waters of the State at any place:
 - a) Floating, suspended, or deposited macroscopic particulate matter or foam;
 - b) Bottom deposits or aquatic growths;
 - c) Alternation of temperature or apparent color beyond present natural background levels;
 - d) Visible, floating, suspended, or deposited oil or other products of petroleum origin;
 - e) Toxic or other deleterious substances to be present in concentrations or quantities which will cause deleterious effects on aquatic biota, wildlife, or waterfowl, or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentrations.
2. The discharge of waste shall not cause the following limits to be exceeded in waters of the State in any place within one foot of the water surface:
 - a) Dissolved oxygen: 5.0 mg/l minimum. The median dissolved oxygen concentration for any three consecutive months shall not be less than 80% of the dissolved oxygen content at saturation. When natural factors cause lesser concentration(s) than specified above, the discharger shall not cause further reduction in the concentration of dissolved oxygen.
 - b) pH: The pH shall not be depressed below 6.5 nor raised above 8.5, nor caused to vary from normal ambient pH levels by more than 0.5 units.
 - c) Un-ionized ammonia (as N): 0.025 mg/l Annual Median, 0.4 Maximum at any time.
3. This discharge shall not cause a violation of any applicable water quality standard for receiving waters adopted by the Board or the State Water Resources Control Board as required by the Federal Water Pollution Control Act and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the Federal Water Pollution Control Act or amendments


thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

C. PROVISIONS

1. The discharger shall comply with all sections of this order immediately upon starting any discharge.
2. The discharger shall comply with the Self-Monitoring Program as adopted by the Board and as may be amended by the Executive Officer.
3. The discharger shall propose a study which will document background dissolved metal concentrations in the groundwater, dissolved metal concentrations in the treatment system influent and effluent, and the effect that dissolved metal concentrations in the discharge has on drinking water sources, and on the surface receiving waters. This proposal should be submitted to this office within 60 days from the adoption of this permit.
4. The discharger shall notify the Regional Board if any activity has occurred or will occur which would result in the discharge, on a frequent or routine basis, of any toxic pollutant which is not limited by this Order.
5. This permit may be modified prior to the expiration date to include effluent limitations for toxic constituents determined to be present in the discharge as indicated through the comprehensive monitoring program include as part of this order.
6. The discharger shall comply with all items of the attached "Standard Provisions, Reporting Requirements and Definitions" dated December, 1986, except items A.10, B.2, B.3, C.8 and C.11.
7. This Order expires May 26, 1995. The discharger must file a report of waste discharge in accordance with Title 23, Chapter 3, Subchapter 9 of the California Administrative Code not later than 180 days in advance of such expiration date as application for issuance of new waste discharge requirements.
8. This Order shall serve as a National Pollutant Discharge Elimination System Permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its

issuance, the permit shall not become effective until such objection is withdrawn.

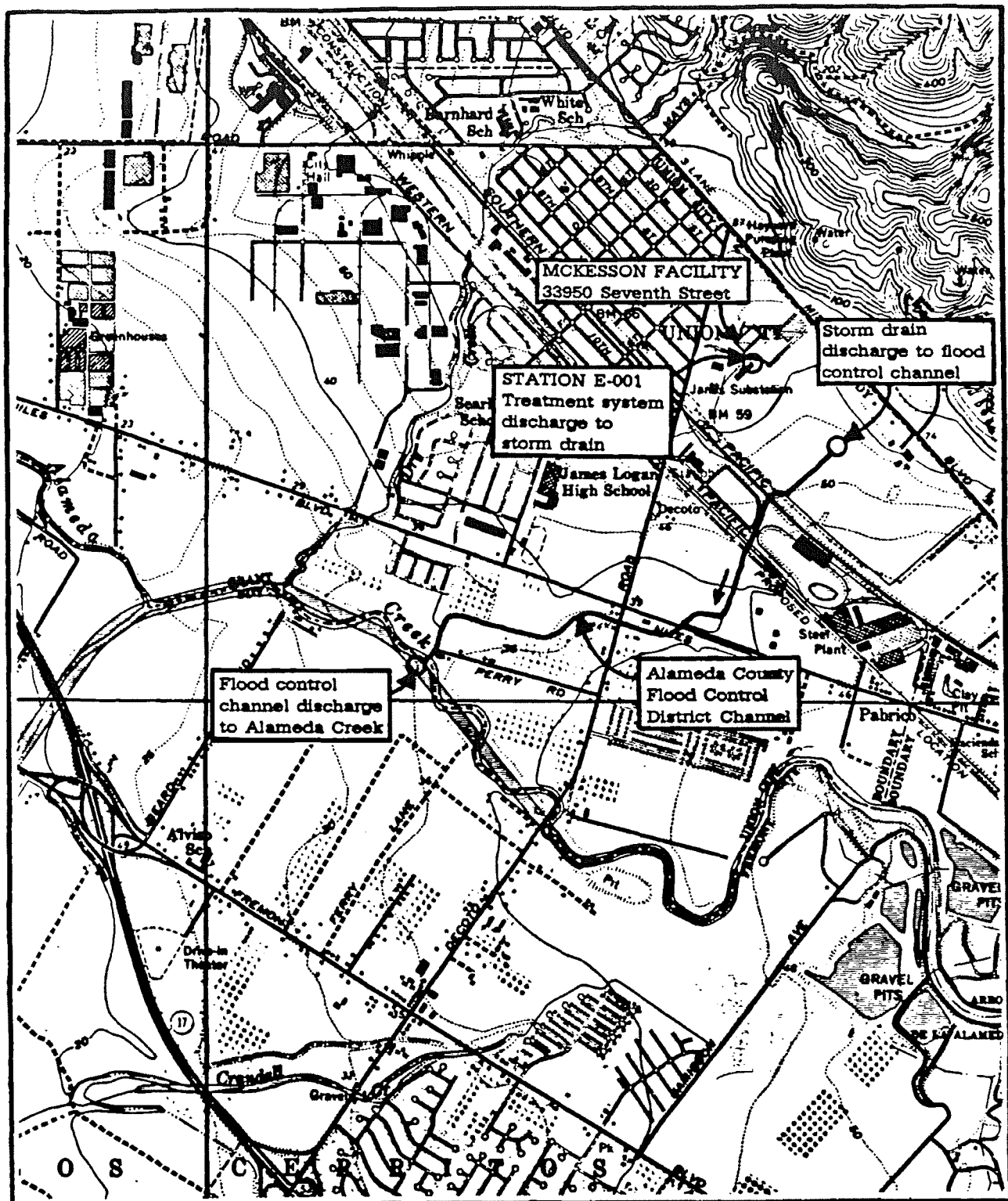
I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on May 16, 1990.



STEVEN R. RITCHIE
Executive Officer

Attachments:

Site Map
Self-Monitoring Program
Standard Provisions & Reporting Requirements, December 1986



0 2000
SCALE IN FEET

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SITE MAP
NPDES PERMIT No. CA0029700
MCKESSON CORPORATION
33950 SEVENTH STREET
UNION CITY, ALAMEDA COUNTY

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

McKesson Chemical Company
33950 Seventh Street
Union City, Alameda County

NPDES NO. CA0029700
ORDER NO. 90-057

CONSISTING OF:

PART A, dated December 1986 and modified January 1987,
 including Appendices A through E

PART B, Adopted: May 16, 1990

PART B

McKesson Chemical Company
33950 Seventh Street
Union City, Alameda County

I. DESCRIPTION OF SAMPLING STATIONS

A. INFLUENT

<u>Station</u>	<u>Description</u>
I-001	At a point in the ground water extraction system immediately prior to treatment in the air stripper unit.

B. SYSTEM RELIABILITY

<u>Station</u>	<u>Description</u>
SR-001	At a point immediately following treatment in the first carbon adsorption unit.

C. EFFLUENT

<u>Station</u>	<u>Description</u>
E-001	At a point immediately following treatment in the second carbon adsorption unit.

D. RECEIVING WATERS

<u>Station</u>	<u>Description</u>
R-001	At a point in the receiving waters where the discharge from the E-001 discharge point first encounters existing surface water (each instance shall be located on a map to be included with the scheduled self monitoring report).

II. SCHEDULE OF SAMPLING AND ANALYSIS

The schedule of sampling and analysis is provided in the attached Table A.

III. MODIFICATIONS TO PART A, DATED DECEMBER 1986 AND MODIFIED JANUARY 1987

All items of Self-Monitoring Program Part A, dated December 1986 and as modified January 1987 shall be complied with except for the following:

- A. Additions to Part A: Section G.4.d.5: "Results from each required analysis and observation shall be submitted as laboratory originated data summary sheets in the quarterly self-monitoring reports. All chromatographic peaks for purgeable halocarbons and/or volatile organics shall be identified and quantified for all effluent samples. If previously unquantified peaks are identified in any effluent sample, then these peaks shall be confirmed based on analyses using chemical standards necessary to achieve proper identification and quantification. Results shall also be submitted for any additional analyses performed by the dischargers at the specific request of the Board for parameters for which effluent limits have been established and provided to the dischargers by the Board."
- B. Deletions from Part A: Sections D.2.b., D.2.g., D.3.b., E.1.e.1, E.1.f., E.2.b., E.3., E.4., E.5., F.2.b., G.2.(last paragraph only), G.4.b., and G.4.f.
- C. Modifications to Part A: For the following, the discharger shall comply with the Sections as changed and reported herein:
 - 1. Section D.2.a. is changed to read:

"Samples of effluent and receiving waters shall be collected at times coincident with influent sampling unless otherwise stipulated. The Regional Board or Executive Officer may approve an alternative sampling plan if it is demonstrated that expected operating conditions warrant a deviation from the standard sampling plan."
 - 2. Section D.2.d. is changed to read:

"If two consecutive samples of any one constituent or parameter monitored on a weekly or monthly basis in a 30-day period exceed the effluent limit or are otherwise out of compliance, or if the required sampling frequency is once per month or less (quarterly, annually or other) and the sample or parameter exceeds the limit or is otherwise out of compliance, the discharger shall implement

procedure(s) acceptable to or approved by the Board's Executive Officer, on a case by case basis."

3. Section D.2.e. is changed to read:

"If any instantaneous maximum limit or the total VOC effluent limit is exceeded, within 24 hours of receiving the analytical results indicating the violation, a confirmation sample shall be taken and analyzed with 24 hour turn-around time. If the instantaneous maximum limit is violated in the second sample, the Board's staff shall be notified within 24 hours of receiving the analytical results from confirmation sample. The discharger shall implement procedures acceptable to or approved by the Board's Executive Officer, on a case by case basis. If the total VOC effluent limit is violated in the second sample, the discharge shall terminate immediately, and shall not resume until the cause of the violation is found and corrected to the satisfaction of the Board's Executive Officer ."

4. In Section F.1, the phrase "(at the waste treatment plant)" is changed to read, "(at the location of the extraction and treatment system)".

5. Section G.4.e is changed to read:

"Summary tabulations of the data shall include, for each constituent, total number of analyses, maximum, minimum, and average values for each period. Total flow data shall also be included. This information shall be prepared in a format similar to EPA Form 3320-1. This information shall be submitted to the Regional Board:

Executive Officer
California Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612"

6. The Annual Report required in Section G.5. shall be submitted by January 30 of each year in place of the monthly report due on the same day.

IV. MISCELLANEOUS REPORTING

1. If any chemicals or additives are proposed to be used in the operation and/or maintenance of the ground water extraction/treatment system, the discharger shall notify the Alameda County Water District and the Regional Board, and shall obtain the Regional Board's Executive Officer's concurrence prior to use. The details concerning such approved use shall be reported in the next periodic report submitted to the Board.
2. During start-up of the treatment system and/or after any major tower/column maintenance (i.e. recharging or repacking towers or columns), and/or after any other major maintenance (necessitating treatment system shut down for more than two hours), the effluent shall be sampled, and contained onsite. The sample shall be analyzed with a 24 hour turn-around. If the instantaneous maximum effluent limits have been met, then the operation of the system can continue. If the instantaneous maximum limits have been exceeded then the problem shall be corrected before start-up can continue.

I, Steven R. Ritchie, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

- I. Has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Regional Board Order No. 90-057.
- II. Was adopted by the Board on May 16, 1990.
- III. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the dischargers, and revisions will be ordered by the Executive Officer or Regional Board.


STEVEN R. RITCHIE
Executive Officer

Attachment: Table A

NPDES NO. CA0029700

Sampling Station	I-1	SR-1	E-1	R-1
TYPE OF SAMPLE	G	G	G	G
Flow Rate (mgd)			W	W
BOD, 5-day, 20°C, or COD (mg/l & kg/day)			Y	
Chlorine Residual & Dosage (mg/l & kg/day)				
Settleable Matter (ml/1-hr. & cu. ft./day)			Q	
Total Suspended Matter (mg/l & kg/day)				
Oil and Grease (mg/l & kg/day)				
Coliform (Total or Fecal) (MPN/100 ml) per req't				
Fish Tox'y 96-hr. TL & Surv'l in undiluted waste			Y	
Ammonia Nitrogen (mg/l & kg/day)			V	
Nitrate Nitrogen (mg/l & kg/day)				
Nitrite Nitrogen (mg/l & kg/day)				
Total Organic Nitrogen (mg/l & kg/day)				
Total Phosphate (mg/l & kg/day)				
Turbidity (Jackson Turbidity Units)				
pH (units)			Q	
Dissolved Oxygen (mg/l and % Saturation)			Q	
Temperature (°C)			Q	
Apparent Color (color units)				
Secchi Disc (inches)				
Sulfides (if DO<5.0 mg/l) Total & Dissolved (mg/l)				
Arsenic (mg/l & kg/day)	Q		M	
Cadmium (mg/l & kg/day)	Q		M	
Chromium, Total (mg/l & kg/day)	Q		M	
Copper (mg/l & kg/day)	Q		M	
Cyanide (mg/l & kg/day)	Q		M	
Silver (mg/l & kg/day)	Q		M	
Lead (mg/l & kg/day)	Q		M	

TABLE A (continued)											
SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS											
Sampling Station	I-1		SR-1		E-1		R-1				
TYPE OF SAMPLE	G		G		G		G				
Mercury (mg/l & kg/day)	Q				M						
Nickel (mg/l & kg/day)	Q				M						
Zinc (mg/l & kg/day)	Q				M						
Phenolic Compounds (mg/l & kg/day)											
All Applicable Standard Observations											
Bottom Sediment Analyses and Observations											
EPA Method 601 with Freon 113	WMQ		W		W/M						
EPA Method 602	Q				M						
Acetone	Q				Q						
Isopropyl Alcohol	Q				Q						
Methyl Ethyl Ketone	Q				Q						
TPH as gasoline and diesel	Q				Q						

LEGEND FOR TABLE

TYPES OF SAMPLES

- G = grab sample
- C-24 = composite sample - 24-hour
- C-X = composite sample - X hours
(used when discharge does not
continue for 24-hour period)
- Cont = continuous sampling
- DI = depth-integrated sample
- BS = bottom sediment sample
- O = observation

TYPES OF STATIONS

- I = treatment facility influent stations
- E = waste effluent stations
- C = receiving water stations
- P = treatment facilities perimeter stations
- L = basin and/or pond levee stations
- B = bottom sediment stations
- G = groundwaters stations

FREQUENCY OF SAMPLING

- E = each occurrence
- H = once each hour
- D = once each day
- W = once each week
- M = once each month
- Y = once each year
- V = varies; total ammonia
nitrogen shall be ana-
lyzed and unionized am-
monia calculated whenever
fish bioassay test re-
sults fail to meet the
specified percent survival

- 2/H = twice per hour
- 2/W = 2 days per week
- 5/W = 5 days per week
- 2/M = 2 days per month
- 2/y = once in March and
once in September
- Q = quarterly, once in
March, June, Sept.
and December

- 2H = every 2 hours
- 2D = every 2 days
- 2W = every 2 weeks
- 3M = every 3 months
- Cont = continuous

- W/M = weekly for the first two months
after startup of operations and
reduced to monthly thereafter

- WMQ = weekly for the first two months
after startup of operations,
reduced to monthly for the next
six months, then reduced to
quarterly thereafter